

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327  JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
THIS DOCUMENT RELATES ONLY TO:  WAVE 10 CASE LISTED ON EXHIBIT A	

**DEFENDANTS' MOTION TO EXCLUDE THE  
GENERAL OPINIONS AND TESTIMONY OF WILLIAM PORTER, M.D.**

Pursuant to the Federal Rules of Evidence and *Daubert v. Merrill Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993), and its progeny, Defendants Ethicon, Inc., Ethicon, LLC, and Johnson & Johnson ("Defendants") respectfully move the Court for an order excluding the general opinions and testimony of Plaintiff's proffered expert, William Porter, M.D.

This motion, as explained in the accompanying Memorandum of Law in Support, is based on the grounds that Dr. Porter lacks the requisite credentials to offer certain of his opinions, fails to employ a reliable methodology to arrive at his causation opinions, and certain of his opinions constitute inadmissible hearsay. This motion is supported by the Memorandum of Law in Support and the following Exhibits:

<b>Exhibit</b>	<b>Description</b>
A	Listing of Applicable Case (Wave 10)
B	Rule 26 Expert Report of William Porter, M.D.

Defendants therefore request that this Court grant its motion and exclude Dr. Porter's general causation opinion testimony in its entirety. Defendants pray for all other relief to which they are entitled.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that I have this day electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

William M. Gage